

Edward A. Keane*
Garth S. Wolfson*

Of Counsel
Stephen J. Murray+

*Also admitted in NJ
+Also admitted in CT

MAHONEY & KEANE, LLP

Attorneys at Law
40 Worth Street, Suite 602
New York, New York 10013
Telephone (212) 385-1422
Facsimile (212) 385-1605
gwolfson@mahoneykeane.com

Connecticut Office

14 Pilgrim Lane
Weston, CT 06883
Tel: (203) 222-1019
Fax: (203) 222-0252

July 19, 2023

VIA ECF AND VIA E-MAIL

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007
Failla_NYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

Re: **Case No. 22 Civ. 8525 (KPF)**
Maersk Line A/S v.
World Cargo Solutions LLC
Our File No. 12/4510

Honorable Madam,

We represent the Plaintiff, MAERSK LINE A/S (“MAERSK”), in the above-referenced action and write jointly with counsel for the Defendant, WORLD CARGO SOLUTIONS LLC (“WCS”), to request an extension of the parties’ time to submit their proposed joint pretrial order (“JPTO”) to 30 days from the parties’ next status report, if no dispositive motions are wanted, or otherwise from the resolution on any such motions.

Paragraph 15 of the Civil case Management Plan and Scheduling Order dated January 9, 2023 calls for the JPTO to be filed within 30 days of the close of discovery or the decision on any dispositive motions. While discovery has now closed, by Order dated July 6, 2023, the case was referred to Magistrate Judge Netburn for a settlement conference, now set to go forward on September 12, 2023, after which the parties are to provide a status report to the Court and advise of the extent to which dispositive motion practice may still be sought. Accordingly, we believe the spirit of the Court’s initial Scheduling Order, as well as efficiency for all concerned, would best be served by a concomitant adjournment of the JPTO due date as aforesaid.

Once again, we thank the Court for its consideration.

Respectfully submitted,

MAHONEY & KEANE, LLP
By: s/ Garth S. Wolfson
Garth S. Wolfson

Application GRANTED. Recognizing the upcoming settlement conference between the parties, the Court STAYS the deadline for the Parties' joint pretrial order ("JPTO") pending further order of the Court. The Court directs the parties to provide a joint update on the status of the case and any settlement discussions by **September 19, 2023**, after which the Court will promptly reset the deadline for the JPTO if the parties are unable to reach settlement.

Dated: July 19, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE